

REMARKS

This response is submitted in response to an Office Action mailed on April 17, 2007. Claims 1-34 were pending at the time the Office Action was issued. Applicants hereby amend claims 5-7, 13, and 19. Claims 1-34 remain pending.

In the interest of reducing the issues to be considered in this response, the following remarks focus principally on the patentability of independent claims 1, 13, 19, 25, and 30. The patentability of each of the dependent claims is not necessarily separately addressed in detail. However, Applicants' decision not to discuss the differences between the cited art and each dependent claim should not be considered as an admission that Applicants concur with the conclusions set forth in the Office Action that these dependent claims are not patentable over the disclosure in the cited references. Similarly, Applicants' decision not to discuss differences between the prior art and every claim element, or every comment set forth in the Office Action, should not be considered as an admission that Applicants concur with the interpretation and assertions presented in the Office Action regarding those claims. Indeed, Applicants believe that all of the dependent claims patentably distinguish over the references cited. Moreover, a specific traverse of the rejection of each dependent claim is not required, since dependent claims are patentable for at least the same reasons as the independent claims from which the dependent claims ultimately depend.

I. REJECTION UNDER 35 U.S.C. § 112

The Office Action states that claims 7 and 13 are rejected under 35 U.S.C. §112, Second Paragraph. Applicants have amended claim 7 to recite “unselected” instead of “the unselected”. Moreover, Applicants have amended claim 13 to recite “the modified services” instead of “the selected services,” and recite “unmodified” instead of “the unselected.” Accordingly, Applicants respectfully request reconsideration and withdrawal of these rejections.

II. REJECTIONS UNDER 35 U.S.C. § 102

Claims 1-6, 8-31, and 33-34 are rejected under 35 U.S.C. § 102(e) as being unpatentable over U.S. Patent Publication 2003/0131078 to Scheer et al. (hereinafter “Scheer”). Respectfully, Applicants submit that the claims are allowable over Scheer for at least the reasons explained in detail below.

Claims 1-6 and 8-12

Claims 2-6 and 8-12 depend from Claim 1. Claim 1 recites:

1. A method comprising:
identifying at least one role associated with a target server;
identifying one or more services associated with the role;
identifying one or more ports associated with the role;
presenting the identified services and ports associated with
the role to a user; and
requesting the user to select among the identified ports for
activation in the target server.

Applicants respectfully assert that Scheer does not disclose, teach or fairly suggest every aspect of claim 1. First, Scheer does not teach or suggest,

“presenting the identified services and *ports* associated with the role to a user,” as recited in claim 1. (emphasis added).

Instead, Scheer discloses that “a user may use a wizard program having a graphic user interface 228 that resides on the master configurer 102” to create a network design. (Paragraph 12, Lines 2-5). Scheer further discloses that once the master configurer 102 receives the network design, the master configurer 102 “configures the digital images of each network component to include the unique operational network settings for that network,” which includes port settings. (Paragraph 12, Lines 6-12).

In other words, Scheer discloses that the user interface 228 enables a user to create a network design, but does not specifically disclose that a network design includes network settings that comprise port setting. Further, Scheer specifically discloses that the master configurer 102, rather than a user, configures the network settings that include port settings. Thus, Scheer does not disclose presenting identified ports to a user, as it discloses that the port settings are configured by the master configurer 102. (Paragraph 12, Lines 6-12).

Additional sections of Scheer further indicate that Scheer does not teach presenting port settings to a user. Scheer disclose a configuration logic block 222. (Paragraph 22, Line 6). As disclosed by Scheer, the configuration logic block 222 includes a “configuration file” that enables it to “generate the unique network settings, such as IP addresses and ports, for each component...” (Paragraph 29, Lines 4-6). Thus, since Scheer teaches a configuration file, rather than the graphic user interface 228, provides the information for the master configurer 102 to generate port settings, Scheer does not teach presenting identified ports to a user.

Second, Scheer does not teach or suggest “*requesting the user to select among the identified ports for activation in the target server,*” as recited in claim 1. (emphasis added). In contrast, Scheer discloses that the master configure 102 may deploy the digital images onto network components so that “the components in the operational server farm communicate and work cohesively *without the user needing to manually change settings or parameters* on the software on those components.” (emphasis added). (Paragraph 13, Lines 7-11). Accordingly, Scheer cannot teach or suggest “requesting the user to select among the identified ports for activation in the target server.”

Thus, for at least the above reasons, the method recited in claim 1 is not anticipated by Scheer. Since claims 2-6 and 8-12 depend from claim 1, they are allowable over the cited reference to Scheer at least due to their dependency, as well as due to additional limitations recited.

Specifically, claim 6 is further allowable over Scheer. Claim 6, as amended, recites:

6. A method as recited in claim 1 further comprising:
Identifying an operating system level of a target server;
determining one or more security levels for the target server based on the identified operating system level of the target server; and
selecting one of the determined security levels for the target server,
wherein identifying at least one role includes identifying at least one role associated with the target server based on the selected security level.

Scheer discloses that a user may use a user interface 228 that resides on the master configurator 102 to create a network design. (Paragraph 12, Lines 2-5).

However, Scheer does not teach or suggest, as recited in claim 6:

identifying an operating system level of a target server;

*determining one or more security levels for the target server based on the identified operating system level of the target server; and
selecting one of the determined security levels for the target server. (emphasis added).*

Accordingly, claim 6 is further allowable over Scheer.

Moreover, claim 10 is further allowable over Scheer. Claim 10, as amended, recites:

10. A method as recited in claim 1 further comprising displaying a list of options for handling a service associated with the target server that is not defined in a knowledge base.

Scheer does not teach the method recited in claim 10. In contrast, Scheer discloses "a wizard program" that may guide a user through a graphic user interface 228 to generate a network topology, or a pattern of interconnection between components, for a network. (Paragraph 26, Lines 1-5). Scheer further discloses that the wizard program also enables a user to submit:

a network design, a design list of functions that the server farm should perform, the amount and type of hardware components that populate the network, and the number of WAN IP addresses assigned to the network. (Scheer, Paragraph 27, Lines 1-5).

However, Scheer does not teach or suggest displaying a list of options for handling a service that is not defined in its database 236. (Figure 2, Paragraph 32, Lines 1-5). Thus, claim 10 is further allowable over Scheer.

Further, since Scheer does not teach or suggest the method recited in claim 10, Scheer also cannot teach or suggest, "a method as recited in claim 10 further comprising requesting the user to select an option for handling the service," as recited in claim 11. Accordingly, claim 11 is further allowable over Scheer.

Claims 13-18

Claims 14-18 depend from claim 13. Claim 13 recites:

13. A method comprising:
identifying one or more roles associated with a target server;
identifying one or more services associated with the roles;
displaying the identified services associated with the roles;
allowing a user to modify the displayed services; and
identifying the modified services as active services and
identifying unmodified services as inactive services.

Applicants respectfully assert that Scheer does not disclose, teach or fairly suggest every aspect of claim 13. First, Scheer does not teach or suggest, “displaying the *identified services* associated with the roles,” as recited in claim 13. (emphasis added). In contrast, Scheer discloses “a wizard program” that may guide a user through a graphic user interface 228 to generate a network topology by presenting topology options that meet design function requirements. (Paragraph 25, Lines 1-5, 16-19). As defined by Scheer, network topology is a pattern of interconnection between components. Scheer further discloses that the wizard program also enables a user to submit:

a network design, a design list of functions that the server farm should perform, the amount and type of hardware components that populate the network, and the number of WAN IP addresses assigned to the network. (Scheer, Paragraph 27, Lines 1-5).

However, Scheer does not teach or suggest displaying *services* that are associated with a function that the server farm should perform. Network design, network topology, hardware components, and WAN IP addresses are not equivalent to “identified services.”

Second, Scheer does not teach or suggest, *"allowing a user to modify the displayed services,"* as recited in claim 13. Instead, Scheer disclose a graphic user interface 228 that enables a user to choose a particular network topology for deployment, and submit a network design, a design list of functions, amount and type of hardware, and WAN IP addresses. (Paragraph 26, Lines 1-5 and 16-19; Paragraph 27, 1-5). However, Scheer does not teach allowing a user to modify "displayed services".

Third, Scheer also does not teach or suggest, *"identifying the modified services as active services and identifying unmodified services as inactive services,"* as recited in claim 13. Even assume, *in arugendo*, that the firewall servers, e-mail servers, and web services disclosed by Scheer are equivalent to services, Scheer's disclosure regarding a design rule logic block 220 assigning sockets and ports using data sheets still does not teach user modified services. (Paragraph 23, Lines 1-3 and 8-12). Moreover, Scheer also does not disclose designating the respect servers and services as active and inactive. Accordingly, Scheer does not teach this element of claim 13.

Thus, for at least the above reasons, the method recited in claim 13 is not anticipated by Scheer. Since claims 14-18 depend from claim 13, they are allowable over the cited reference to Scheer at least due to their dependency, as well as due to additional limitations recited.

Claims 19-24

Claims 20-24 depend from claim 19. Claim 19, as amended, recites:

19. A method comprising:
identifying a role associated with a target server;
identifying one or more ports associated with the role;

presenting the identified ports associated with the role to a user;
requesting the user to select among the identified ports associated with the role; and
identifying the selected ports as active ports and identifying unselected ports as inactive ports.

Applicants respectfully assert that Scheer does not disclose, teach or fairly suggest every aspect of claim 19. First, Scheer does not teach or suggest, "presenting the identified services and *ports* associated with the role to a user," as recited in claim 19. (emphasis added).

Instead, Scheer discloses that "a user may use a wizard program having a graphic user interface 228 that resides on the master configurer 102" to create a network design. (Paragraph 12, Lines 2-5). Scheer further discloses that once the master configurer 102 receives the network design, the master configurer 102 "configures the digital images of each network component to include the unique operational network settings for that network," which includes port settings. (Paragraph 12, Lines 6-12).

In other words, Scheer discloses that the user interface 228 enables a user to create a network design, but does not specifically disclose that a network design includes network settings that comprise port setting. Further, Scheer specifically discloses that the master configurer 102, rather than a user, configures the network settings that include port settings. Thus, Scheer does not disclose presenting identified ports to a user, as it discloses that the port settings are configured by the master configurer 102. (Paragraph 12, Lines 6-12).

Additional sections of Scheer further indicate that Scheer does not teach presenting port settings to a user. Scheer disclose a configuration logic block 222. (Paragraph 22, Line 6). As disclosed by Scheer, the configuration logic block 222 includes a "configuration file" that enables it to "generate the unique network

settings, such as IP addresses and ports, for each component...” (Paragraph 29, Lines 4-6). Thus, since Scheer teaches a configuration file, rather than the graphic user interface 228, provides the information for the master configurer 102 to generate port settings, Scheer does not teach presenting identified ports to a user.

Second, Scheer does not teach or suggest “*requesting the user to select among the identified ports associated with the role,*” as recited in claim 19. (emphasis added). In contrast, Scheer discloses that the master configure 102 may deploy the digital images onto network components so that “the components in the operational server farm communicate and work cohesively *without the user needing to manually change settings or parameters* on the software on those components.” (emphasis added). (Paragraph 13, Lines 7-11). Accordingly, Scheer cannot teach or suggest “requesting the user to select among the identified ports for activation in the target server.”

Third, since Scheer cannot teach or suggest, “requesting the user to select among the identified ports for activation in the target server,” it follows that Scheer also does not teach or suggest, “*identifying the selected ports as active ports and identifying unselected ports as inactive ports,*” as recited in claim 19.

Thus, for at least the above reasons, the method recited in claim 19 is not anticipated by Scheer. Since claims 20-24 depend from claim 19, they are allowable over the cited reference to Scheer at least due to their dependency, as well as due to additional limitations recited.

Specifically, claim 23 is further allowable over Scheer. Claim 23 recites:

23. A method as recited in claim 22 further comprising:
displaying one or more ports associated with the role; and

requesting the user to select among the one or more ports to activate in the target server.

Specifically, Scheer does not teach or suggest “requesting the user to select among the one or more ports to activate in the target server,” as recited in claim 23. Instead, as noted above, Scheer discloses that the master configurer 102 may deploy the digital images onto network components so that “the components in the operational server farm communicate and work cohesively *without the user needing to manually change settings or parameters* on the software on those components.” (emphasis added). (Paragraph 13, Lines 7-11). Thus, claim 23 is further allowable.

Claims 25- 29

Claims 26-29 depend from claim 25. Claim 25 recites:

25. An apparatus comprising:
- a pre-processor to receive information regarding server roles from a knowledge base and to receive characteristics of a target server, wherein the pre-processor generates a file containing server role information relevant to the target server, and wherein information in the file regarding services and ports associated with the server roles is presented to a user for selection; and
 - a configuration engine coupled to the pre-processor, wherein the configuration engine configures the target server based on the user's selection of services and ports.

Applicants respectfully assert that Scheer does not disclose, teach or fairly suggest every aspect of claim 25. Specifically, Scheer does not teach or suggest, “wherein information in the file regarding services and *ports* associated with the server roles is presented to a user for selection,” as recited in claim 25. (emphasis added). Instead, Scheer discloses that “a user may use a wizard program having a graphic user interface 228 that resides on the master configurer 102 to create a

network design. (Paragraph 12, Lines 2-5). Scheer further discloses that once the master configurer 102 receives the network design, the master configurer 102 “configures the digital images of each network component to include the unique operational network settings for that network,” which includes port settings. (Paragraph 12, Lines 6-12).

In other words, Scheer discloses that the user interface 228 enables a user to create a network design, but does not specifically disclose that a network design includes network settings that comprise port setting. Further, Scheer specifically discloses that the master configurer 102, rather than a user, configures the network settings that include port settings. Thus, Scheer does not disclose presenting identified ports to a user, as it discloses that the port settings are configured by the master configurer 102. (Paragraph 12, Lines 6-12).

Additional sections of Scheer further indicate that Scheer does not teach presenting port settings to a user. Scheer disclose a configuration logic block 222. (Paragraph 22, Line 6). As disclosed by Scheer, the configuration logic block 222 includes a “configuration file” that enables it to “generate the unique network settings, such as IP addresses and ports, for each component...” (Paragraph 29, Lines 4-6). Thus, since Scheer teaches a configuration file, rather than the graphic user interface 228, provides the information for the master configurer 102 to generate port settings, Scheer does not teach presenting identified ports to a user.

Thus, for at least the above reasons, the apparatus recited in claim 25 is not anticipated by Scheer. Since claims 26-29 depend from claim 25, they are allowable over the cited reference to Scheer at least due to their dependency, as well as due to additional limitations recited.

Claims 30-31 and 33-34

Claims 31 and 33-34 depend from claim 30. Claim 30 recites:

30. One or more computer-readable media having stored thereon a computer program that, when executed by one or more processors, causes the one or more processors to:
identify a role associated with a target server;
identify one or more services associated with the role;
identify one or more ports associated with the role;
display the identified services and ports associated with the role; and
receive selected services and ports to be activated on the target server.

Applicants respectfully assert that Scheer does not disclose, teach or fairly suggest every aspect of claim 30. First, Scheer does not teach or suggest, “display the identified services and *ports* associated with the role,” as recited in claim 30. (emphasis added). Instead, Scheer discloses that “a user may use a wizard program having a graphic user interface 228 that resides on the master configurer 102” to create a network design. (Paragraph 12, Lines 2-5). Scheer further discloses that once the master configurer 102 receives the network design, the master configurer 102 “configures the digital images of each network component to include the unique operational network settings for that network,” which includes port settings. (Paragraph 12, Lines 6-12).

In other words, Scheer discloses that the user interface 228 enables a user to create a network design, but does not specifically disclose that a network design includes network settings that comprise port setting. Further, Scheer specifically discloses that the master configurer 102, rather than a user, configures the network settings that include port settings. Thus, Scheer does not disclose presenting identified ports to a user, as it discloses that the port settings are configured by the master configurer 102. (Paragraph 12, Lines 6-12).

Additional sections of Scheer further indicate that Scheer does not teach presenting port settings to a user. Scheer disclose a configuration logic block 222. As disclosed by Scheer, the configuration logic block 222 includes a "configuration file" that enables it to "generate the unique network settings, such as IP addresses and ports, for each component..." (Paragraph 29, Lines 4-6). Thus, since Scheer teaches a configuration file, rather than the graphic user interface 228, provides the information for the master configurer 102 to generate port settings, Scheer does not teach presenting identified ports to a user.

Second, since Scheer does not teach or suggest "display the identified services and *ports* associated with the role," Scheer also cannot teach or suggest "receive selected services and ports to be activated on the target server," as further recited in claim 30.

Thus, for at least the above reasons, the apparatus recited in claim 30 is not anticipated by Scheer. Since claims 31 and 33-34 depend from claim 30, they are allowable over the cited reference to Scheer at least due to their dependency, as well as due to additional limitations recited.

III. REJECTIONS UNDER 35 U.S.C. § 103

Claims 7 and 32 are rejected under 35 U.S.C. § 103(a) as being unpatentable over Scheer. Applicants respectfully submit that the claims are allowable over Scheer for at least the reasons explained in detail below.

Claim 7

Claim 7 depend from claim 1. Claim 1 recites:

1. A method comprising:
 - identifying at least one role associated with a target server;
 - identifying one or more services associated with the role;
 - identifying one or more ports associated with the role;
 - presenting the identified services and ports associated with the role to a user; and
 - requesting the user to select among the identified ports for activation in the target server.

Applicants respectfully assert that Scheer does not disclose, teach or fairly suggest every aspect of claim 1. To this end, Applicants incorporate and reassert the argument present above in response to the rejection of claim 1 under 35 U.S.C. § 102(e).

Accordingly, Applicants respectfully assert that Scheer does not teach or suggest, “presenting the identified services and *ports* associated with the role to a user,” and “*requesting the user to select among the identified ports for activation in the target server,*” as recited in claim 1. (emphasis added).

Thus, for at least the above reasons, the method recited in claim 1 is not rendered obvious by Scheer. Since claim 7 depends from claim 1, it is allowable over the cited reference at least due to its dependency, as well as due to additional limitations recited.

Claim 32

Claim 32 depend from claim 30. Claim 30 recites:

30. One or more computer-readable media having stored thereon a computer program that, when executed by one or more processors, causes the one or more processors to:
 - identify a role associated with a target server;
 - identify one or more services associated with the role;
 - identify one or more ports associated with the role;
 - display the identified services and ports associated with the role; and

receive selected services and ports to be activated on the target server.

Applicants respectfully assert that Scheer does not disclose, teach or fairly suggest every aspect of claim 30. To this end, Applicants incorporate and reassert the argument present above in response to the rejection of claim 30 under 35 U.S.C. § 102(e).

Accordingly, Applicants respectfully assert that Scheer does not teach or suggest, “display the identified services and *ports* associated with the role,” and “*receive selected services and ports to be activated on the target server,*” as recited in claim 1. (emphasis added).

Thus, for at least the above reasons, the method recited in claim 1 is not rendered obvious by Scheer. Since claim 7 depends from claim 1, it is allowable over the cited reference at least due to its dependency, as well as due to additional limitations recited.


CONCLUSION

Applicants respectfully submit that claims 1-34 are in condition for allowance. Applicants respectfully request entry of the amendment, as well as consideration and prompt allowance of the claims. If any issue remains unresolved that would prevent allowance of this case, the Examiner is requested to contact the undersigned attorney to resolve the issue.

Respectfully Submitted,

Dated: 7-17-07

By: _____


Elliott Y. Chen
Reg. No. 58,293
Lee & Hayes, PLLC
421 W. Riverside Ave, Suite 500
Spokane, WA 99201
Phone: (206) 315-4001 x104
or (206) 315-7914
Fax: (206) 315-4004